Ohio Environmental Protection Agency

Division of Emergency and Remedial Response

Pre-CERCLIS Screening Assessment Checklist Decision Form and Report

for

American Compressed Steel Corporation
900 East Front Street
Cincinnati, Ohio

Prepared by: Matthew Justice
Matthew Justice, Site Coordinator
Ohio EPA, DERR/SWDO

Date: February 24, 2006

Reviewed by:
Randy Waterworth, Sr. Site Coordinator
Ohio EPA, DERR/SWDO

Date: February 24, 2006

Approved by: Laura J. Ripley
Laura Ripley, Early Action Manager
U.S. EPA, Region 5

Date: original approved and entered into CERCLIS 9/29/2003
updated report accepted 5/23/2006

Pre-CERCLIS Screening Assessment Checklist Decision Form
American Compressed Steel Corporation

The checklist can be used to assist the site investigator during Pre-CERCLIS screening. This checklist should document the rationale for decision as to whether further steps in the site investigation process are required under CERCLA.

Prepared by: Matthew Justice, Site Coordinator, Ohio EPA, DERR/SWDO

Address: 401 E. Fifth Street; Dayton, OH; 45402-2911 Phone: (937) 285-6040

Date: March 17, 2006

Site Name: American Compressed Steel Corporation

Site Location: 900 E. Front Street; Cincinnati, Ohio

PHASE A - CERCLA Eligibility Evaluation

If the answer to any one of these is yes, the sites can be NFRAPed or Archived	YES	NO
1. Is the site non-existent, or is it not a duplicate (or "alias") of another site?		X
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?		X
3. Are the hazardous substances potentially released at the site excluded statutorily (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC< UMTRCA, or OSHA)?		X
4. Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferred to RCRA Corrective Action, FIFRA, or Brownfields)?		X
5. Is there insufficient data (provided by the State) to verify that a release has occurred (e.g., based on potentially unreliable sources or with no information to support the presence of hazardous substances or CERCLA eligible pollutants and contaminants)?	X	
6. Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARS, completed removal action, previous HRS score determined, or an EPA approved risk assessment completed)?		X

PHASE B - INITIAL SITE EVALUATION

Use Exhibit A to make site assessment decisions based on the answers below:	YES	NO
Is there documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?		X
Is there an apparent release at the site with no documentation of exposed targets, but there are targets on-site or immediately adjacent to the site?		X
Is there an apparent release and no documented on-site targets, but there are nearby targets (e.g., targets within 1 mile)?		X
Is there indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on-site or in proximity to the site?		X
Documented on-site or nearby targets?		X
Uncontained sources containing CERCLA eligible substances are present on site.		X
There are releases or potential to release.		X

Please explain all yes answer(s). **See Attached Narrative**

EPA Regional Review and Site Assessment Decision

Check the box(es) that apply:

X ☐ Not a valid site or incident for further action under CERCLA
____ ☐ APA
____ ☐ Full PA
____ ☐ Combined PA/SI
____ ☐ SI

Defer/Refer to:

____ ☐ Removal Program
____ ☐ State/Tribal Program
____ ☐ RCRA
____ ☐ Brownfields
____ ☐ Other: _____

Regional EPA Reviewer: Laura J. Ripley (Name) 05/23/2006 (Date)

Introduction

The American Public Health Journal printed a report by William P. Eckel (spring, 2001) on the use of historical methods for identifying previously unrecognized, former lead smelting properties. Eckel conjectured such properties have potential for elevated lead in surface soil, and therefore may pose associated environmental risk. His study, brought to the attention of U.S. EPA, identified several hundred former lead smelting facilities in 35 states. Seventeen of these sites are located in Ohio. One of these, a former American Compressed Steel Corporation facility located at 900 Front Street in Cincinnati, was among the sites identified. Therefore U.S. EPA, Region 5, requested Ohio EPA conduct a pre-CERCLIS screening to evaluate the site's potential for lead associated environmental risk.

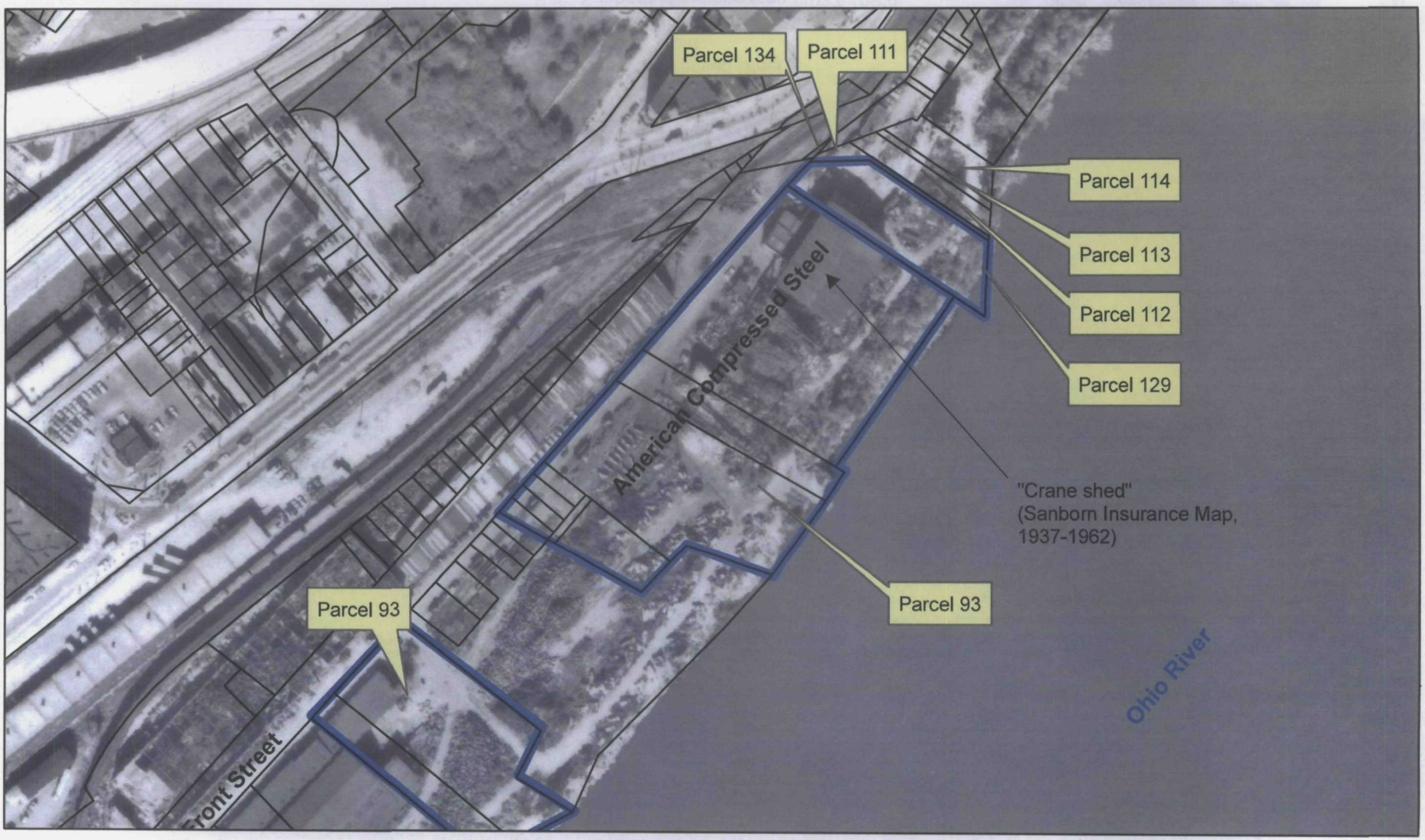
Location

The former American Compressed Steel (ACS) site is located just east of downtown Cincinnati, along the Ohio River. It is bound by Front Street to the north, and the Ohio River to the south. The river front restaurant, Montgomery Inn, bounds the site to the northeast, and a park bounds the site to the southwest. The site is transected by Interstate 471.

Hamilton County Audtor's Office records indicate ACS acquired Parcel Nos. 85-1-111 through 114, and Parcel No. 134 from the Little Miami Railroad Company in 1956. Parcel No.129 was acquired from the Little Miami Railroad Company in 1950. ACS conveyed all these properties had the address 883 or 900 Front Street (letter to Ohio EPA, Nov. 23, 2005). Figure 1 identifies these parcels, during the period of ACS operations, overlying a 1967 aerial photograph. Figure 2 identifies these parcels, after cessation of ACS operations, overlying an aerial photograph circa 2001 or 2002 (B. Simpson, Ohio EPA).

In addition to parcels 111 through 114, 134, and 129, a letter from the city of Cincinnati to Ohio EPA (October 26, 2005) indicates that the former ACS site also included parcel 93. As explained by the city, the former ACS parcel 93 was transferred to Cincinnati in 1975. Figures 1 and 2 display all known parcels comprising the ACS site. The land area of all known parcels containing the ACS site is approximately 7 acres.

Figure 1
American Compressed Steel
900 East Front Street, Cincinnati
October 1967



0 100 200 400 Feet

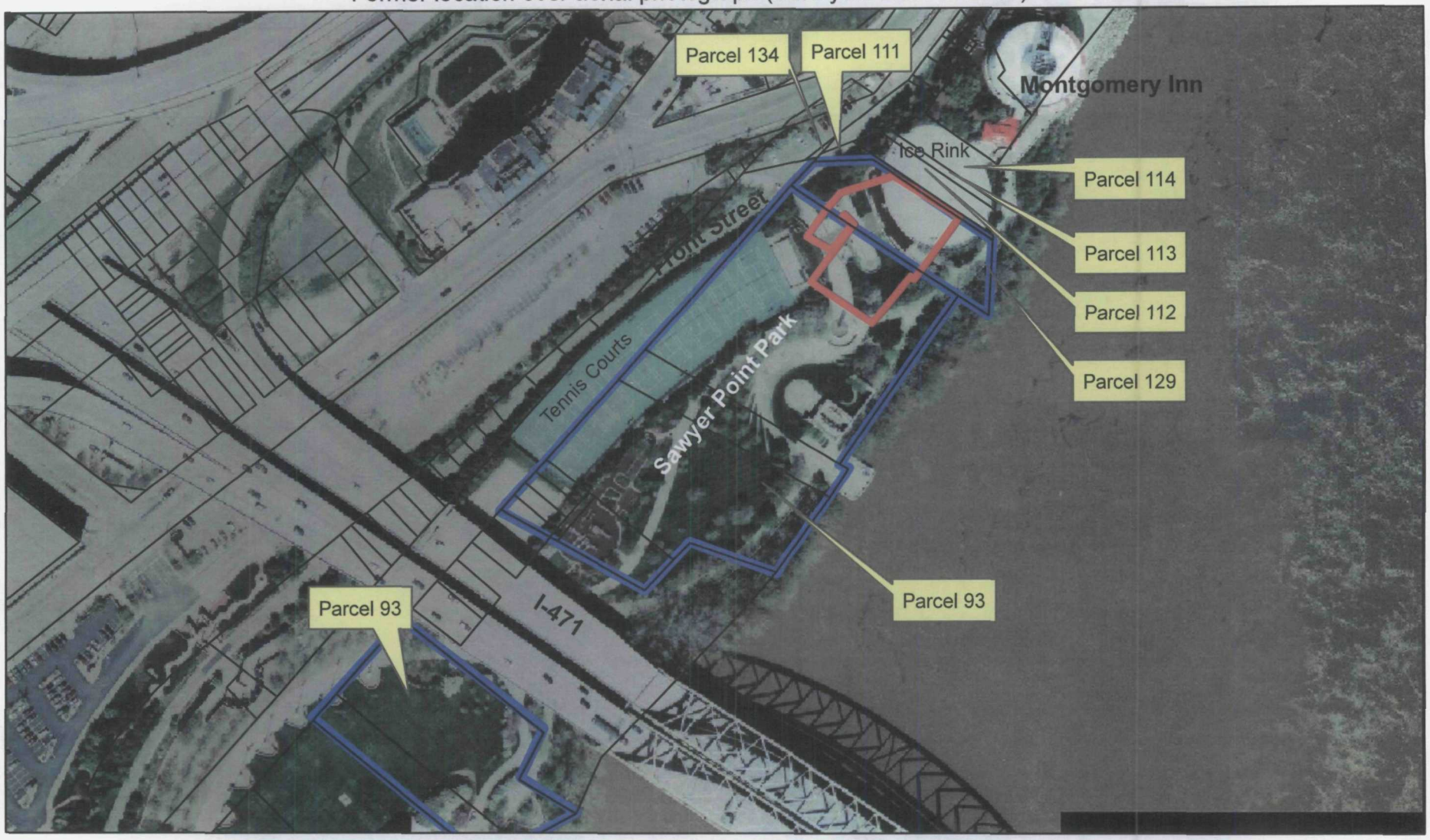
Scale 1:2400
1 inch = 200 Feet

Sawyer Point Park

OhioEPA

N

Figure 2
American Compressed Steel
900 East Front Street, Cincinnati
Former location over aerial photograph (circa year 2001 or 2002)



0 100 200 400 Feet

Scale 1:2400
1 inch = 200 Feet

American Compressed Steel
900 E. Front Street
Former crane shed
Ref: Sanborn insurance map (1937-1962)

Sawyer Point Park

OhioEPA

N

History of Land Use

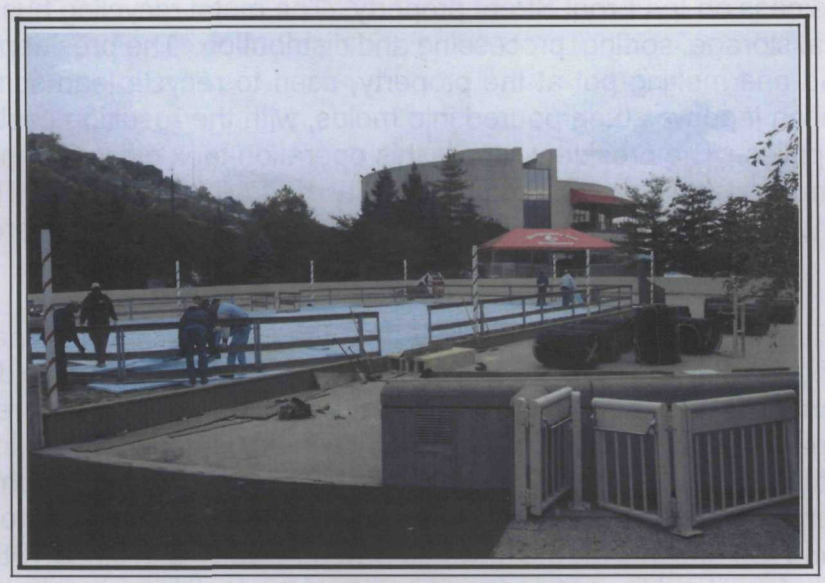
American Compressed Steel (ACS) operated as a ferrous and nonferrous metal processor as early as 1937 (ACS response letter to Ohio EPA, Nov. 25, 2003). Accordingly, a rail yard existed at the property. As stated, ACS operated a traditional metal scrap yard and recycling business on the Front Street property. The metal recycling business consisted of scrap metal storage, sorting, processing and distribution. The president of ACS recalls that ACS had one melting pot at the property, used to recycle lead scrap materials by heating. Molten lead was then poured into molds, with the resulting casts being sold for plumbing supplies. The president recalls this operation took place for approximately ten years, until the property was acquired by the City of Cincinnati in 1975. The two principal owners of the business involved in the day-to-day activities at the property are now deceased.

The city of Cincinnati verified to Ohio EPA that they acquired real property and certain immovable fixtures from ACS in 1975 in an eminent domain action. The Journal Entry on Verdict summarizing the property acquisition is recorded in the public records as Deed Book 4031, page 129 of the Hamilton County, Ohio Recorder's Office. In addition to the parcels identified by ACS (Nov. 25, 2005). The city also verified ownership of Parcels 93 and 129. Parcels 93 and 129 were redeveloped by the city and have been utilized as a public park and recreational area, known as Sawyer Point Park, since 1988. The 15 acre park was paved and landscaped. A large portion of the park is covered with tennis courts, walking paths, an amphitheater, and parking lots. Hamilton County Auditor records indicate parcels 111 through 114 and 134, adjacent to the park, are also owned by the city. As shown in Figure 2, an ice rink is located within these parcels.

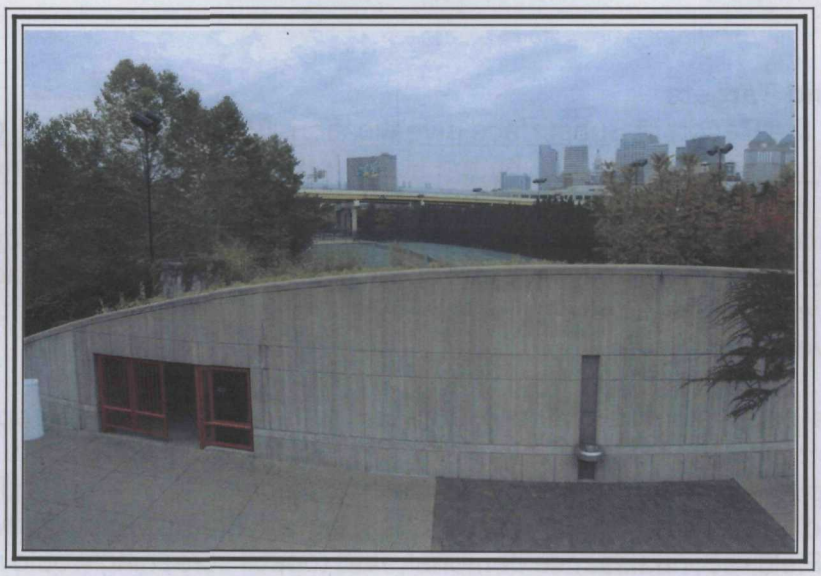
Pathways and Targets

According to the Report of Subsurface Investigation, Sawyer Point Park, Cincinnati, Ohio for City of Cincinnati, Ohio, 1996, by the H.C. Nutting Company, the land area between Front Street and the Ohio River is "made land," with fill depths of 30 to 35 feet below ground surface. On June 24, 2003, Ohio EPA conducted site reconnaissance at the site. Ohio EPA found the original ACS ground surface buried or paved, and landscaped as part of the Sawyer Point Park development. Photographs 1 and 2 highlight the nature and extent of paved areas.

No residential population lives within or adjacent to the site. The target population consists exclusively of visitors to Sawyer Point Park. Potable water is provided to the site through Cincinnati's public water system. Because the original ACS site ground surface is non-existent, Ohio EPA suggests soil direct contact, ingestion, and vapor pathways of concern are absent. Field reconnaissance demonstrated topsoil screening would not provide data useful for evaluating the original site ground surface. Therefore no soil samples were collected. The potential affect of the ACS site on Ohio River sediment was beyond the scope of the pre-CERCLIS screening; therefore, no sediments were sampled.



Photograph 2. Ice rink at Parcel 114 facing east.
Montgomery Inn is located in the background.



Photograph 1. Parcel 129 of Sawyer Point facing west.
Tennis courts and Interstate 471 in background.

Conclusion

The ground surface of the former ACS site at 900 Front Street, Cincinnati, Ohio is either buried or paved. Therefore no soil or air migration pathway of concern is present. No residential population is present within or adjacent to the site. Potable water is provided to Sawyer Point Park through the city of Cincinnati public water system; therefore, no surface water or ground water migration pathways of concern are expected. The site has been put to beneficial reuse, and serves as a popular public park and recreational facility for the city of Cincinnati.

PRE-CERCLIS SCREENING (PCS) ASSESSMENT CHECKLIST/DECISION FORM

The checklist can be used to assist the site investigator during Pre-CERCLIS screening. This checklist should document the rationale for the decision as to whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Kelvin Jones, ESII — September 23, 2003

Name/Title — Date

4675 Homer-Ohio Lane Groveport, OH — 614-836-8758

Address — Phone

Kelvin.Jonesk@epa.state.oh.us

E-mail Address

Site Name: American Compress Steel Company

Previous names (if any): _____

Site Location: 900 E. Front Street, Cincinnati, Ohio / Hamilton County
(See attached description and maps).

Latitude: (if applicable) 39° 06-13.6 **Longitude:** 84° 29-40.3

PHASE A - CERCLA Eligibility Evaluation

If the answer to any one of these is yes, the sites can be NFRAPed or Archived	YES	NO
1.Is the site non-existent, or is it not a duplicate (or "alias") of another site?	X	
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?		X
3. Are the hazardous substances potentially released at the site excluded statutorily (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC< UMTRCA, or OSHA)?		X
4. Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferred to RCRA Corrective Action, FIFRA, or Brownfields)?		X
5. Is there insufficient data (provided by the State) to verify that a release has occurred (e.g., based on potentially unreliable sources or with no information to support the presence of hazardous substances or CERCLA eligible pollutants and contaminants)?		X
6. Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARS, completed removal action, previous HRS score determined, or an EPA approved risk assessment completed)?		X

PHASE B - INITIAL SITE EVALUATION

Use Exhibit A to make site assessment decisions based on the answers below:	YES	NO
Is there documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?		X
Is there an apparent release at the site with no documentation of exposed targets, but there are targets on-site or immediately adjacent to the site?		X
Is there an apparent release and no documented on-site targets, but there are nearby targets (e.g., targets within 1 mile)?		X
Is there indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on-site or in proximity to the site?		X
Documented onsite or nearby targets?		X
Uncontained sources containing CERCLA eligible substances are present on site.		X
There are releases or potential to release.		X

Please explain all yes answer(s). See Attached Narrative

EPA Regional Review and Site Assessment Decision

Check the box(es) that apply:

- ☐ NFRAP/Archive DO NOT ENTER INTO CERCLIS, NOT A VALID SITE OR INCIDENT.
- ☐ APA
- ☐ Full PA
- ☐ Combined PA/SI
- ☐ SI

Defer/Refer to:

- ☐ Removal Program
- ☐ State/Tribal Program
- ☐ RCRA
- ☐ Brownfields
- ☐ Other: _____

Regional EPA Reviewer: Original misplaced approved by EPA 9/29/2003 (Print Name/Signature) (Date) 05/23/2006

Introduction

In the spring of 2001, the *American Public Health Journal* published a report on former lead smelting facilities that are potentially contaminated with high levels of lead. The study, which was conducted by a doctoral candidate and a USEPA employee, cited 430 former lead smelting facilities in 35 states that are unknown to federal and state authorities. Of the sites listed, 17 are located in Ohio. This PCS focuses on one of these sites, American Compress Steel Corporation.

High levels of Lead Contamination are a major problem for the City of Cincinnati and its surrounding cities. Lead Contamination reaches as far as North to Hamilton, Ohio and south to the Cincinnati /Kentucky borders and the Ohio River. There are more than 27 zip codes in the Cincinnati area. The City of Cincinnati uses the zip codes to mark high lead areas. Currently, the City of Cincinnati is conducting a Lead Soil Abatement Project. This study includes cities like Boston, Baltimore, Cleveland, and Cincinnati Lead soil contamination. In certain areas inner City of Cincinnati, results showed high Lead contamination which has made the Ohio Department of Health (ODH) and the Cincinnati Health Department test the children for high lead levels. The University of Cincinnati is currently doing soil studies on Lead in particular neighborhoods in Cincinnati.

Site Description

The former American Compress Steel Corporation was located at 900 E. Front Street in Cincinnati Ohio. The street name has changed to Meharing Way, and the property was a ten (10) acre site that is now part of a multi-complex. The site's border to the west is the street's Meharing Way and Eastern Avenue. The boarder to the south is part of Sawyer Park. The boarder to the east is the Ohio River. And, the boarder to the north is the multi-complex parking lot. See Figures 1, the Site location Map.

Site History

The American Compress Steel site first appeared in 1937 as a Ferrous & Nonferrous scrap metal processor. In 1960, American Compress Steel purchased a Lead Smelter, they produced Ingots and Babbitts for the plumbing industry. They operated a Smelter until 1982 when they began shutting down their operation. The City of Cincinnati inherited the land in 1986 as eminent domain for redeveloping the Cities River Front

District. The weighed scale remains as the only landmark from the old site. The weighed scale, is part of the new front entrance at the Montgomery Inn Restaurant and Multi-Complex. The site first appeared on Sanborn Fire Insurance Maps in 1936 where the site was labeled as Queen City Coal Yard. This site map can be seen on Figure 2.

Pathways & Targets

Soil Pathway

On June 24, 2003, the Ohio EPA field staff conducted Soil Sampling Screening, to be screened by Xray Fluorescence for Metals. There were no soil samples collected due to the following reasons. There had been heavy rain fall throughout the Cincinnati and Kentucky area. Heavy debris drifted down the river which would have compromised any samples collected off the river bank. Base upon past and new construction at the 900 East Front and/or Meharing Way, and several tons of dirt were trucked in to help raise the ground level and to support the river bank. The former ten acres is capped with tons of Cement and Black Top from the Ice/Roller Rink, Multi-Complex, and the Parking Lot.

Sediment Pathway

The pathway for Sediment was not addressed as an issue of concern. Therefore, no Sediment Samples were collected.

Surface Water Pathway

The pathway for Surface Water was not addressed as an issue of concern. Therefore, no Surface Water Samples were collected.

Ground Water Pathway

The pathway for Ground Water was not addressed as an issue of concern. Therefore, no Ground Water Samples were collected

Air Pathway

The pathway for air was not addressed as an issue concern. The site is covered with cement and black top; therefore, no air samples were collected.

Conclusions

From the historical information gathered, the site smelting facility and general scrap yard no longer exist. The property was taken by the City of Cincinnati and redeveloped. In light of these facts, no further site investigation is necessary.

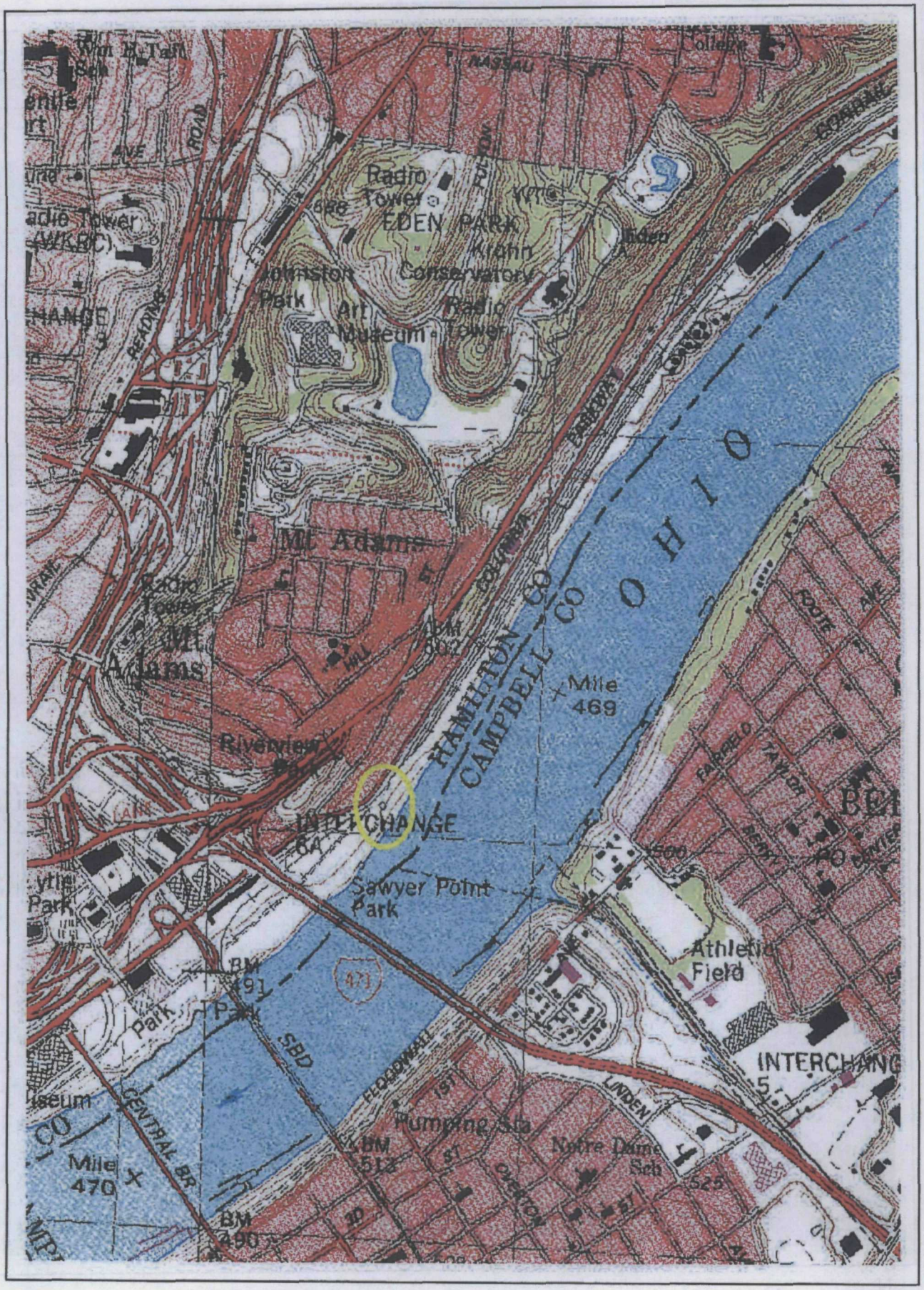
LIST OF FIGURES and ATTACHMENTS

Figure One Site location Map

Figure Two Sample location Map

Attachment One Photo Log

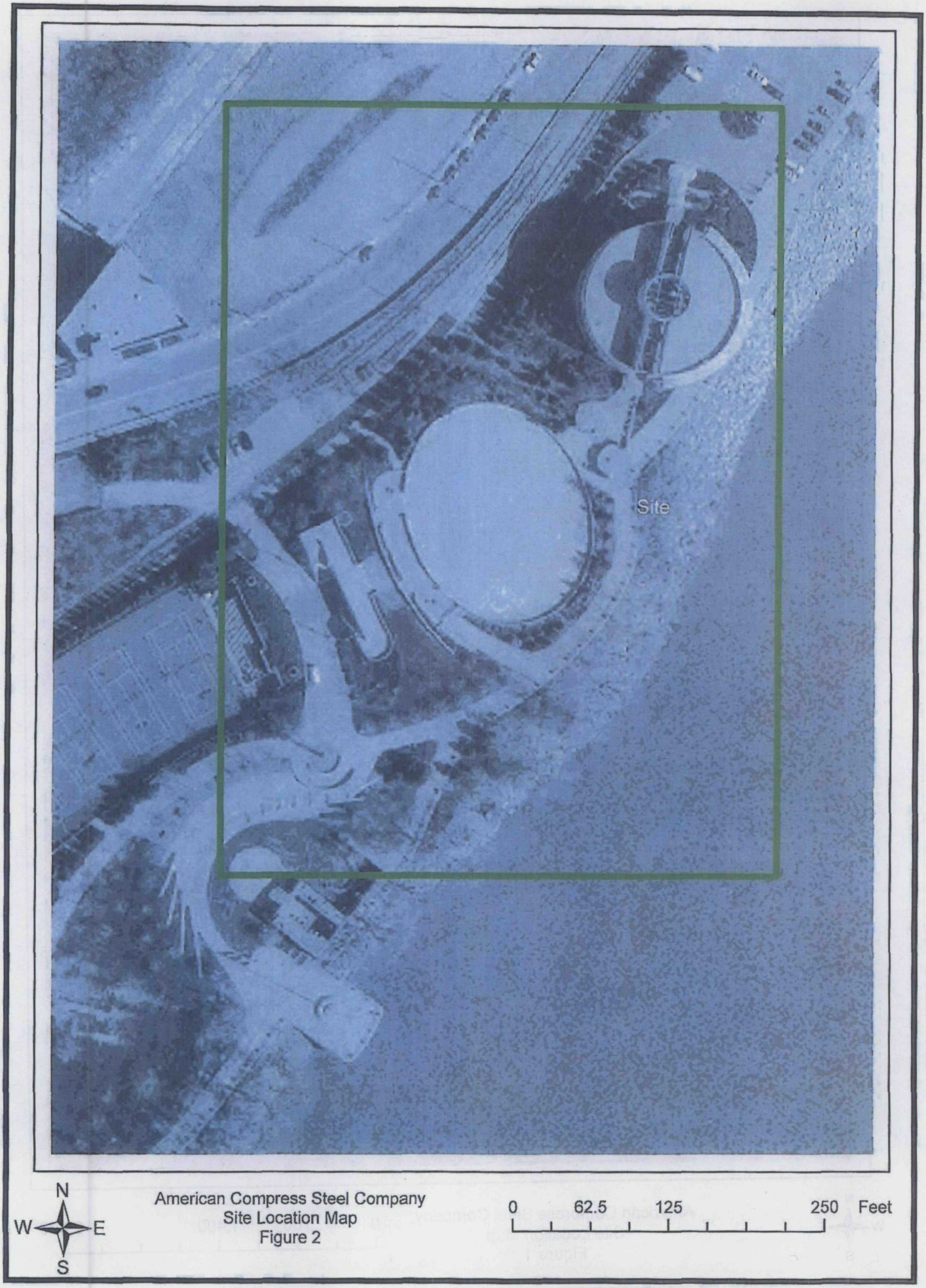
References



N
W E
S

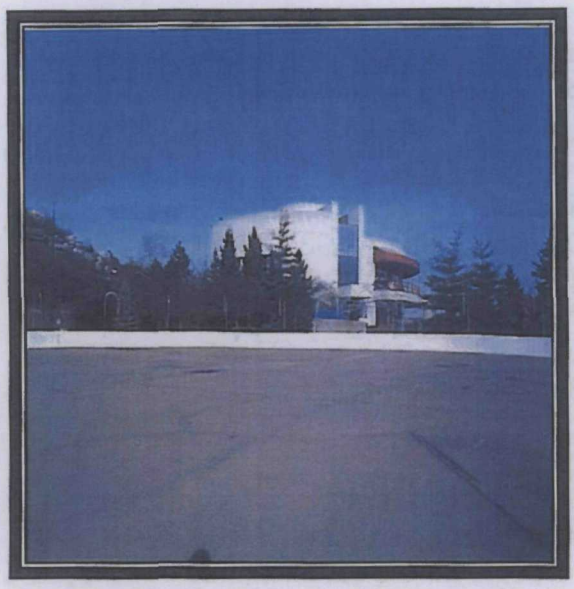
American Compress Steel Company
Site Location Map
Figure 1

0 700 1,400 2,800 Feet

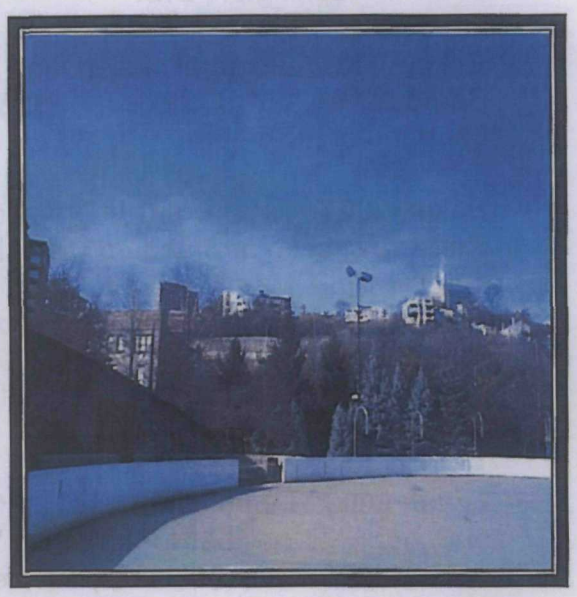


American Compress Steel Company
Site Location Map
Figure 2

ATTACHMENT ONE
PHOTO LOG

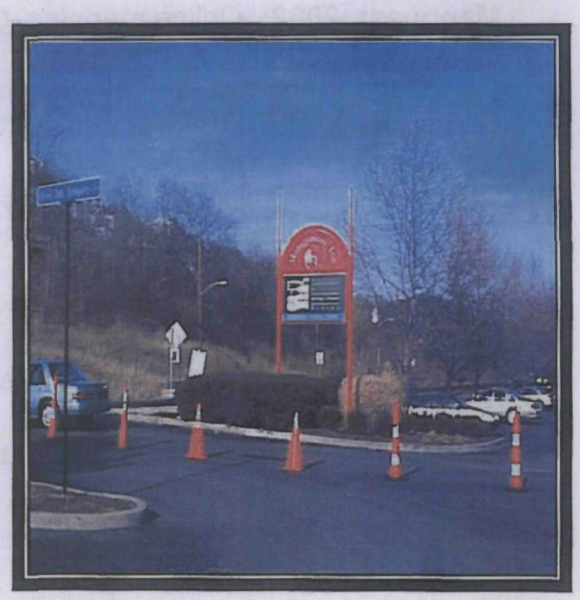


Jan 3, 2003 Recon; at the Montgomery Inn and Multi Complex.
This is the South side of the property and north end of Ice Rink.



Jan 3, 2003 Recon; at the Montgomery Inn and Multi Complex.
This is the South side of the property and south end of Ice Rink.

Jan 3, 2003 Recon; at the Montgomery Inn and Multi Complex.
This is the North side of the property. The Weigh Scale Entrance.



Jan 3, 2003 Recon; at the Montgomery Inn and Multi Complex.
This is the North side of the property and Parking Lot.

REFERENCES

APHJ, 2001: Journal article entitled "Discovering Unrecognized Lead-Smelting Sites by Historical Methods"; written by William P. Eckel, Michael B. Rabinowitz & Gregory D. Foster; 91:625-627' published in the American Public Health Journal in April of 2001 edition; Washington, D.C.

Eckel, 2001: Doctoral dissertation by William P. Eckel; completed in the Summer Semester of 2001; College of Arts & Sciences at George Mason University; Washington, D.C.

Eckel, 2001: Historic site information provided William P. Eckel from: Metal Smelters & Refiners section of Standard Metal Directory (SMD) directories for 1931, 1904, 1946, 1950 & 1963; Metal Statistics (MS), an annual publication (1937 - 1969) of The American Metal Market Company, published by Diversified Publishing of New York City, NY; and , the Year Book of the American Bureau of Metal Statistics (and later the Non-Ferrous Metals Data) [ABMS] from the American Bureau of Metal Statistics Inc., 1945-1973, of New York City, NY

Eckel, 2003: Information directory from William "Bill" Eckel; Telephone conversation, mail and/or E-mail between Wendy Vorwerk and/or Edward Link of the Ohio EPA; Mr. Eckel's phone # is (703 305-6451) is currently employed by the USEPA in the Environmental Fate and Effects Division of the Office of Pesticide Programs Located on Washington, D.C.

Mapquest, 2002: Online mapping, Color Air Photos and Yellow Pages taken off the Mapquest Internet site, http://www.mapquest.com. Mapquest, a wholly owned subsidiary of America Online, Inc. and based in Denver, CO and Mountville, PA; GlobeXplorer ™ Color Air Photos of Cincinnati, Ohio dated June 2002.

ODH, 2002: Ohio Department of Health; Bureau of Environmental Health; Health Assessment Section; Lexington Manor Site

ODH, 2002: Ohio Department of Health; Ohio Childhood Lead Poisoning Prevention Program; http://www.odh.state.oh.us Lead and Eating Healthy; Lead Can Harm Children; and Children's Lead Levels

ATSDR, 1997: Agency for Toxic Substances and Disease Registry (ATSDR). 1997 Toxicological profile for lead.

Hamilton County General Health District; Ohio Lead Awareness Week July 15-21, 2002 The Mission is Possible: Lead-Safe Kids Hamilton County, Ohio GMT http://www.hamilton-co.org/boh/press%20releases/press_...
Hamilton County General Health District; Lead Screenings; Did you know that lead poisoning is invisible and 100: preventable? Have your children tested for lead, even if they seem healthy? December 1992 GMT http://www.hamilton-co.org/boh/nursing.htm

Hamilton County General Health District; The Lead abatement grant will provide $350,000 to all involved parties and will give older communities in the County an opportunity to detect possible lead problem in homes that have children under six living in them. January 2002 GMT http://www.hamilton-co.org/boh/minutes/feb_01.htm

Hamilton County General Health District; The Hamilton County General Health District is working to prevent lead poisonings by providing lead screenings for county residents at the Health District. April 2002 GMT http://www.hamilton-co.org/boh/press%20releases/press_...

Hamilton County General Health District; Short term exposure can lead to nausea, shortness of breath, severe headaches, and fatigue. August 2002 GMT http://www.hamilton-co.org/boh/press%20releases/press_...

Sanborn, various years: Sanborn Fire Insurance Maps from the Sanborn Map Company from various years from 1886 through 1960; attained from the On-line Research Databases of the Ohio Public Library at the Ohio Historical Society; Columbus, Ohio 2002-03. Http://www.oplin.lib.oh.us/products/SanbornMaps/index.cfm

SMD, 1963: Metal Smelters & Refiners Section, Babbitt & Solder Manufacturers section, Scrap Iron & Metal Dealers section of Standard Metals Directory (SMD) directory 1963; New York City, NY; attained from the main Library at the Ohio State University in Columbus, Ohio.

USEPA: Guidance for Performing Preliminary Assessments Under CERCLA; Washington, D.C., September 1991.

USEPA: Hazardous Ranking System Guidance Manual; Washington, D.C., November 1992.

Ohio EPA–DERR, 2003: site reconnaissance in January 2003; Division of Emergency & Remedial Response (DERR) at the Central Office in Columbus, Ohio